

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

THE CITY OF HUNTINGTON,

Plaintiff,

v.

Civil Action No. 3:17-01362

Hon. David A. Faber

AMERISOURCEBERGEN DRUG
CORPORATION, et al.

Defendants.

CABELL COUNTY COMMISSION,

Plaintiff,

v.

Civil Action No. 3:17-01665

Hon. David A. Faber

AMERISOURCEBERGEN DRUG
CORPORATION, et al.

Defendants.

**NOTICE OF REMOTE 30(b)(6) DEPOSITION OF
WEST VIRGINIA STATE MEDICAL ASSOCIATION**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure and the Deposition Protocol governing this litigation, Defendants Cardinal Health, Inc., AmerisourceBergen Drug Corporation; and McKesson Corporation (“Defendants”), by and through counsel, hereby give notice that the remote, oral videotaped deposition will be taken of one or more officers, directors, managing agents, or other persons designated by West Virginia State Medical Association on July 27, 2020, beginning at 9:00 a.m. Eastern Time. The deposition shall be videotaped and recorded stenographically and will be conducted before a notary public or other person authorized to administer oaths. The oral examination is to be taken for the purposes of discovery, for use at trial, or for such other purposes as are permitted under the Federal Rules of

Civil Procedure, the local rules of the United States District Court for the Southern District of West Virginia, and the Deposition Protocol. Court reporting services and video recording services will be provided by Veritext Legal Solutions (216-523-1313; opioid@veritext.com), who will provide remote access for all parties wishing to participate via video conference or telephone.

PLEASE TAKE FURTHER NOTICE that the Deponent must have access to a laptop, computer, or tablet with web camera capability. Deponent may not use a cell phone to provide testimony. Deponent must also have the capability to view documents electronically. To the extent Deponent is not in possession of the required technology, documents shall be provided to the Deponent in hard copy and/or Deponent's counsel shall provide the required technology.

Recommended Specifications are below:

- i. Computer
- ii. Web Camera
- iii. Internet Browser (Google Chrome Preferred)
- iv. Minimum 10 mb/s wired, secure internet connection

At minimum, Deponent must have sufficient internet connectivity and bandwidth to support a video deposition. Such capacity shall be sufficient to ensure that when used with the system selected for the deposition, there shall be (a) high-quality video upload (from Deponent) and download (to other Participants), (b) no material time discrepancy between audio and video, and (c) consistent connectivity, with no material disruptions.

Dated: July 23, 2020

Respectfully submitted,

/s/ Steven R. Ruby

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 23rd day of July, 2020, the foregoing “Notice of Remote 30(b)(6) Deposition of West Virginia State Medical Association” was served using the Court’s CM/ECF system, which will send notification of such filing to all counsel of record, and via electronic mail to mdl2804discovery@motleyrice.com and track2opioddefendants@reedsmith.com.

Dated: July 23, 2020

/s/ Steven R. Ruby
Steven R. Ruby (WVSB No. 10752)